

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MARYLAND  
Greenbelt

IN RE:

JONATHAN ALVIN ADAMS

Chapter 13

Debtor(s)

Case No. 19-18043

OBJECTION OF WELLS FARGO BANK, N.A.  
TO PROPOSED CHAPTER 13 PLAN AND  
CONFIRMATION THEREOF

Wells Fargo Bank, N.A. and its assignees and/or successors in interest, a secured creditor in the above-entitled Bankruptcy proceeding, hereby submits the following objections to the Confirmation of the Chapter 13 Plan proposed by the Debtor(s):

1. This objecting secured creditor is the beneficiary of a trust deed on property commonly known as 14003 Mary Bowie Pkwy, Upper Marlboro, MD 20774; the promissory note and deed of trust will be attached to the proof of claim when it is filed by the secured creditor.

2. The debtor(s) are due a total estimated pre-petition arrears of \$26,607.50.

3. The proposed Chapter 13 plan does not provide this objecting Secured Creditor with adequate protection or adequate security, according to Sections 362 and 1325 (a) of the Code.

4. The plan does not propose to pay the Secured Creditor's entire claim in that the arrears are listed in the amount of \$13,817.75 and this Creditor's claim is estimated to be \$26,607.50.

## CONCLUSION

Any Chapter 13 Plan proposed by the Debtor(s) must provide for and eliminate the objections specified above in order to be feasible and to provide adequate protection to this objecting secured creditor. It is respectfully requested that confirmation of the Chapter 13 Plan as proposed by the Debtor(s) be denied.

WHEREFORE, secured creditor prays as follows:

1. That confirmation of the proposed Chapter 13 Plan be denied.
2. For attorney's fees and costs incurred herein.
3. For dismissal of the Chapter 13 proceeding.
4. For such other relief as this Court deems proper.

Dated: June 27, 2019

Respectfully submitted  
Wells Fargo Bank, N.A.

By Counsel:

/s/ Malcolm B. Savage, III  
William M. Savage, Esquire  
Kristine D. Brown, Esquire  
Thomas J. Gartner, Esquire  
Gregory N. Britto, Esquire  
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CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of June, 2019 the following person(s) were served a copy of the foregoing Objection to the Chapter 13 Plan in the manner described below:

Via CM/ECF Electronic Notice

Nancy Spencer Grigsby  
185 Admiral Cochrane Dr.  
Suite 240  
Annapolis, MD 21401

Trustee

Richard B. Rosenblatt  
The Law Offices of Richard B. Rosenblatt  
30 Courthouse Square Ste. 302  
Rockville, MD 20850

Debtors' Attorney

Via First Class Mail, Postage Prepaid:

JONATHAN ALVIN ADAMS  
14003 MARY BOWIE PKWY  
UPPER MARLBORO, MD 20774

Debtor(s)

/s/ Malcolm B. Savage, III  
William M. Savage, Esquire  
Kristine D. Brown, Esquire  
Thomas J. Gartner, Esquire  
Gregory N. Britto, Esquire  
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